

1 J Christopher Jorgensen  
Nevada Bar No. 5382  
2 Adrienne Brantley-Lomeli  
Nevada Bar No. 14486  
3 LEWIS ROCA ROTHGERBER CHRISTIE LLP  
3993 Howard Hughes Parkway, Suite 600  
4 Las Vegas, NV 89169  
Phone: (702) 949-8200  
5 Email: [cjorgensen@lrrc.com](mailto:cjorgensen@lrrc.com)  
Email: [abrantley@lrrc.com](mailto:abrantley@lrrc.com)

6 *Attorneys for Defendant*  
7 *Navient Solutions, LLC*

8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

10 RUTH A. KANE,

11 Plaintiff,

12 vs.

13 NAVIENT SOLUTIONS, LLC;  
EQUIFAX INFORMATION SERVICES,  
14 LLC,

15 Defendants.

Case No.: 2:18-cv-00406-JAD-PAL

**STIPULATION AND [PROPOSED]  
ORDER TO EXTEND DEFENDANT  
NAVIENT SOLUTIONS, LLC'S TIME  
TO RESPOND TO COMPLAINT**

**(SECOND REQUEST)**

Compl. Filed: March 7, 2018

Hon. Judge Jennifer A. Dorsey  
Hon. Magistrate Judge Peggy A. Leen

17 This second Stipulation to Extend Time to Respond to Complaint is made by and  
18 between Plaintiff Ruth A. Kane ("Plaintiff") and Defendant Navient Solutions, LLC  
19 ("NSL") through their respective counsel, in light of the following facts:

20 RECITALS

21 A. Plaintiff filed the Complaint ("Complaint") against NSL on or about  
22 March 7, 2018.

23 B. NSL was served with the Complaint on or about March 8, 2018.

24 C. On March 26, 2018, this Court extended NSL's response deadline until  
25 April 26, 2018.

26 D. The parties have diligently conferred regarding this matter but require  
27 additional time to research the claims at issue.

1 E. The Parties therefore have mutually agreed to extend NSL's time to  
2 respond to the Complaint an additional two weeks until May 10, 2018.

3 F. The parties agree that the requested extension will permit the parties to  
4 continue to research the claims at issue and discuss a potential resolution of this matter.

5 G. There is good cause to grant this stipulation because the Parties require  
6 additional time to investigate Plaintiff's claims and to consider a potential resolution of  
7 this matter.

8 H. Pursuant to Local Rule IA 6-2 and Local Rule 7.1, Plaintiff and NSL  
9 respectfully request that the Court extend NSL time to respond to Plaintiff's Complaint  
10 through May 10, 2018.

11 **STIPULATION**

12 NOW, THEREFORE, Plaintiff and NSL hereby stipulate and agree that NSL has  
13 up to and including May 10, 2018, to file a response to Plaintiff's Complaint.

14 **IT IS SO STIPULATED.**

15 Dated: April 20, 2018

Dated: April 20, 2018

16 HAINES & KRIEGER, LLC

LEWIS ROCA  
ROTHGERBER CHRISTIE LLP

17  
18  
19 By: /s/ Rachel B. Saturn  
David H. Krieger  
Rachel B. Saturn  
20 Attorneys for Plaintiff Ruth A. Kane

By: /s/ Adrienne Brantley-Lomeli  
J Christopher Jorgenson  
Adrienne Brantley-Lomeli  
21 Attorneys for Defendant  
Navient Solutions, LLC

22  
23 **ORDER**

24 **IT IS SO ORDERED**

25   
26 Honorable Peggy A. Leen  
United States District Judge

27 DATED April 24, 2018  
28